



POLICY

Privacy and Personal Data Protection Policy

How we collect, use, protect and keep personal data

RBM-DMCC-POL-015 · Version 1.0 · 21 September 2026

Classification: Public

RBM Mineral Resources DMCC

A member of RBM Group · Licence DMCC-912115 · Dubai, United Arab Emirates

Document control

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Approved by	Senior Management — Rashaad Haroun Rayman, Director
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Related documents	RBM-DMCC-POL-011 Record Keeping and Retention Policy

Version history

Version	Date	Change
1.0	21 September 2026	First issue. Written for UAE law in force at the effective date, including Federal Decree-Law No. (10) of 2025 and Cabinet Resolution No. (134) of 2025.

Approval

This document is approved by Senior Management of RBM Mineral Resources DMCC and takes effect on the effective date above. It is reviewed at least annually, and sooner if the law, the business or its risk profile changes.

Rashaad Haroun Rayman
Director — Senior Management
Date: _____

Laura Alina Dragu
Compliance Officer (management level)
Date: _____

1. Who we are

RBM Mineral Resources DMCC (DMCC registration DMCC198655, licence DMCC-912115), Unit 5430, Level 54, Almas Tower, Jumeirah Lakes Towers, Dubai, United Arab Emirates, is the controller of the personal data described in this policy. We process personal data under the UAE Federal Decree-Law No. (45) of 2021 on the Protection of Personal Data (PDPL), which applies to companies in the DMCC free zone. Contact us about privacy at compliance@rbmgroup.ae.

2. Whose data and what data

People	Personal data
Customers and online shop users	Name, date of birth, nationality, contact details, address, identity documents and their images, selfie and liveness check, Emirates ID or passport number, occupation, source of funds and wealth information, bank account details used for payment, order history, account login and device data.
Directors, owners, signatories and staff of corporate customers and suppliers	Name, identity documents, nationality, address, role, ownership percentage, PEP status.
Visitors to our website	Technical data (IP address, browser, pages visited) through essential cookies.
People who contact us or raise a concern	What they choose to tell us.

We also obtain data from sanctions, PEP and adverse media screening services, public registers and identity verification providers.

3. Why we use it and on what basis

Purpose	Legal basis
Customer due diligence, beneficial ownership, sanctions screening, monitoring and reporting required by UAE anti-money laundering law	Compliance with a legal obligation
Supply chain due diligence required by UAE gold sourcing regulations	Compliance with a legal obligation
Opening your account, processing orders and payments, delivery	Performance of a contract with you
Keeping records, defending legal claims, preventing fraud	Legal obligation; establishment, exercise or defence of legal claims
Marketing emails about our products and prices	Your consent, which you can withdraw at any time

4. Who we share it with

- UAE authorities where the law requires, including the Financial Intelligence Unit, the Ministry of Economy and Tourism, the Executive Office for Control and Non-Proliferation, the Federal Tax Authority and the courts;
- refiners and banks that need due diligence information on a supply chain or payment;
- service providers acting on our instructions, such as identity verification, screening, secure logistics, hosting and IT providers, under contracts that protect your data;
- other members of RBM Group, where needed for the purposes above.

We never sell personal data. Where data is transferred outside the UAE, we do so only where the PDPL permits and with appropriate safeguards.

5. How long we keep it

UAE anti-money laundering law requires us to keep due diligence and transaction records for at least five years after the end of the relationship or the transaction. We keep other data only as long as needed for the purpose it was collected for. Details are in our Record Keeping and Retention Policy.

6. Your rights

You may ask to access your data, to correct it, to restrict or object to its use, to receive it in a portable form, and to have it erased; and you may withdraw consent to marketing at any time. Some rights are limited where we must keep data by law, and the law does not allow us to disclose certain information relating to anti-money laundering reports. We respond to requests within 30 days. You may complain to the UAE Data Office.

7. How we protect it

Identity documents and due diligence files are stored in access-controlled systems with encryption in transit and at rest, audit logging, and access limited to staff who need it. We do not store payment card data, as we do not accept card payments. If a breach puts your data at risk, we will notify you and the UAE Data Office as the law requires.

8. Changes

We review this policy at least annually. The current version is always on our website.